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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

Case No. 4:18-cv-06753-PJH

This Document Relates to:

ALL ACTIONS

**LEAD PLAINTIFF'S STATEMENT IN
SUPPORT OF SEALING MATERIALS
IDENTIFIED IN DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

(Civil L.R. 79-5)

Judge: Hon. Phyllis J. Hamilton

1
2 Pursuant to Northern District of California Civil Local Rules 7-11, 79-5(c), 79-5(f), and
3 this Court's Standing Order, Plaintiff Bradley Sostack ("Plaintiff") respectfully submits this
4 statement and declaration in response to Defendants' Administrative Motion to Consider Whether
5 Another Party's Materials Should be Sealed (ECF No. 193). Plaintiff seeks an order sealing
6 portions of the Joint Letter Brief filed on January 19, 2023, and Exhibit B thereto, as those
7 materials contain numerous references to Plaintiff's confidential financial affairs.

8 The excerpts of the transcript of Mr. Sostack's deposition included in Exhibit B contain
9 numerous references to Plaintiff's private financial affairs, including information regarding a
10 limited liability company created by Plaintiff, Plaintiff's ownership of various digital assets,
11 Plaintiff's use of wallets to store digital assets, and specific transactions in various digital assets.
12 Declaration of James Taylor-Copeland ("Taylor-Copeland Decl."), ¶ 4.

13 The redacted portions of the Joint Letter Brief contain detailed references to (a) Plaintiff's
14 trading records on the Poloniex exchange and (b) excerpts of the transcript of Plaintiff's deposition.
15 Both the trading records and references to the deposition transcript reflect Plaintiff's "confidential
16 financial affairs," including the timing of Plaintiff's purchases of both XRP and various other
17 digital assets and the circumstances surrounding those purchases. *See* Taylor-Copeland Decl. at ¶
18 5.

19 "It has been well established that the rights of privacy extend to one's confidential
20 financial affairs." *Christensen-Thorson v. E*TRADE Fin. Corp.*, No. C 06-01575 JW, 2006 WL
21 8431340, at *3 (N.D. Cal. July 11, 2006) *Ryan*, 2007 U.S. Dist. LEXIS 62725, at *9 ("Private
22 financial records are normally entitled to privacy protections."); *Valley Bank of Nevada v. Superior*
23 *Ct.*, 15 Cal. 3d 652, 656 (1975) ("right of privacy extends to one's confidential financial affairs.").
24 Indeed, this Court's Order regarding the Joint Letter Brief noted that this type of financial
25 information is "attended with weighty privacy rights." ECF No. 194 at 3.

26 If these documents are not properly sealed, Plaintiff's personal and private financial records
27 will become part of the public record, thereby eviscerating Plaintiff's privacy. Taylor-Copeland
28 Decl. at ¶ 6. There is thus no less restrictive alternative to sealing that will protect Plaintiff's

1 privacy in his confidential financial affairs. Plaintiff therefore respectfully requests that the Court
 2 seal the following materials.

3	4	5	6	7	8
	Documents to be Sealed		Portions to Be Sealed		
	Joint Letter Brief		Redacted references to Ex. B and to Lead		
			Plaintiff's trading records		
	Ex. B, Excerpts of Sostack Deposition		Entirety of document		
	Transcript				

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11 Dated: January 25, 2023

12 By: /s/ Nicholas N. Spear

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In re RIPPLE LABS INC. LITIGATION,

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This Document Relates to:
ALL ACTIONS

**DECLARATION OF JAMES TAYLOR-
COPELAND IN SUPPORT OF SEALING
PURSUANT TO LOCAL RULES 79-5(C)
& (E)**

DECLARATION OF JAMES TAYLOR-COPELAND

1. I am an attorney in the law firm of Taylor-Copeland Law, and counsel for Lead Plaintiff Bradley Sostack. I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.

2. I respectfully submit this declaration in support of Plaintiffs' Administrative Motion to Seal materials submitted in connection with the Parties' January 19, 2023 Joint Discovery Letter (the "Joint Discovery Letter").

3. The documents below contain and describe information that has been designated by Lead Plaintiff as "CONFIDENTIAL" pursuant to the parties' Stipulated Protective Order. *See* ECF No. 143.

Documents Filed Under Seal	Portions Filed Under Seal
Joint Letter Brief	Redacted references to Ex. B and to Lead Plaintiff's trading records
Ex. B, Excerpts of Sostack Deposition Transcript	Entirety of document

4. The excerpts of the transcript of Mr. Sostack's deposition included in Exhibit B contain numerous references to Plaintiff's private financial affairs, including information regarding a limited liability company created by Plaintiff, Plaintiff's ownership of various digital assets, Plaintiff's use of wallets to store digital assets, and specific transactions in various digital assets.

5. The redacted portions of the Joint Letter Brief contain detailed references to (a) Plaintiff's trading records on the Poloniex exchange and (b) excerpts of the transcript of Plaintiff's deposition. Both the trading records and references to the deposition transcript reflect Plaintiff's private financial affairs, including the timing of Plaintiff's purchases of both XRP and various other digital assets and the circumstances surrounding those purchases.

1 6. If these documents are not properly sealed, Plaintiff's personal and private financial
2 records will become part of the public record.

3 I declare under penalty of perjury that the foregoing is true and correct.
4
5
6

7 Dated: January 25, 2023

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